

STATE OF VERMONT
COUNTY OF CHITTENDEN, SS

OCT - 9 2008

MICHAEL A. LEVY
CLERK

STEVE EKBERG,

Plaintiff

Chittenden Superior Court
Docket No. S1251-08 CnC

vs.

CITY OF BURLINGTON,
BURLINGTON POLICE DEPARTMENT,
Defendant

MOTION FOR MORE DEFINITE STATEMENT

U.S. DISTRICT COURT
BURLINGTON, VT.

NOW COMES the City of Burlington/Burlington Police Department ("City"), by and through its attorneys, McNeil, Leddy & Sheahan, P.C., and pursuant to V.R.C.P. 12(e), respectfully moves the Honorable Court to order that Plaintiff provide more detail in his Complaint, at least with regard to his allegations as to "May 13, 1999" and July 7, 1999."¹ In particular, the City requests that Plaintiff be ordered to provide more details as to how he believes any act or omission by the City resulted in any "civil right violation" and/or "failure to protect" on both May 13, 1999 and July 7, 1999. The City seeks such details in order to better frame a responsive pleading.

DATED at Burlington, Vermont this 9th day of October, 2008.

MCNEIL, LEDDY & SHEAHAN, P.C.

By:

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Steve Ekberg, *Pro Se*

400000-00379

MCNEIL,
LEDY &
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BURLINGTON, VERMONT 05401

¹ The undersigned anticipates defending as to the "1999" claims, with different counsel defending the "2008" claims.